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18
UNITED STATES DISTRICT COURT
19
NORTHERN DISTRICT OF CALIFORNIA
20
SAN FRANCISCO DIVISION

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.,
25 OTTOMOTTO LLC; OTTO TRUCKING LLC,
26 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
DECLARATION OF LAMBERTUS
HESSELINK IN SUPPORT OF
WAYMO'S STATEMENT (DKT.
1456)**

Trial Date: October 10, 2017

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff's Administrative Motion to File Under Seal Declaration of Lambertus Hesselink in Support of Waymo's Statement (Dkt. 1456).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Declaration of Lambertus Hesselink	Entire Document

3. The entirety of the Declaration of Lambertus Hesselink contains highly confidential technical information and diagrams illustrating such information of Uber's LiDAR sensors. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information would allow Uber's competitors to gain detailed knowledge into the technical specifications of Uber's LiDAR sensors and use this knowledge to tailor their own LiDAR development, such that Uber's competitive standing could be significantly harmed.

4. Defendants' request to seal is narrowly tailored to those portions of the Declaration of Lambertus Hesselink that merits sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of September, 2017, in Washington, D.C.

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 11, 2017

/s/ Arturo J. González

Arturo J. González